

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: October 22, 2024 at 1:00 P.M. ET

Objection Deadline: October 14, 2024 at 4:00 P.M. ET

Ref. Nos. 23942 & 23979

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' EIGHTY-FIRST
(SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN OVERSTATED AND/OR
UNLIQUIDATED PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”) hereby certify as follows to the best of my knowledge, information and belief:

1. On July 1, 2024, the Debtors filed the *Debtors’ Eighty-First (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims)* [D.I. 23942, redacted & 23979, sealed] (the “Objection”).

2. Pursuant to the Notice of Objection attached to the Objection [D.I. 23942-1 & 23979-1], any responses to the Objection were to be filed no later than October 14, 2024, at 4:00 p.m. (ET) (the “Response Deadline”).

3. On October 17, 2024, Chintzu Chen filed a letter in response to the Objection [D.I. 26953] (the “Chen Response”).

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

4. As of the Date hereof, no other formal responses or other responses to the Objection have been filed or served on the Debtors.

5. The Debtors resolved the Chen Response without modification to the schedule attached to the proposed form of order.

6. The proposed form of order attached to the Objection (the “Proposed Order”) is attached hereto as **Exhibit A**. In accordance with the Court’s electronic order processing procedures, a clean copy of the Proposed Order shall be uploaded to CM/ECF.

7. Accordingly, the Debtors respectfully request that the Court enter the Proposed Order at its earliest convenience.

Dated: December 19, 2024
Wilmington, Delaware

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/s/ Matthew R. Pierce

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